

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW HAMPSHIRE**

SCOTTSDALE CAPITAL ADVISORS CORP,	)	
AND JOHN HURRY,	)	
	)	
Plaintiffs,	)	
	)	CASE NO. 1:16-CV-00545
v.	)	
	)	
THE DEAL, LLC AND WILLIAM MEAGHER,	)	
	)	
Defendants.	)	

**DEFENDANTS' RESPONSE TO PROCEDURAL ORDER**

Defendants The Deal, LLC (“The Deal”) and William Meagher, by and through its attorneys, Shaheen & Gordon, P.A., respectfully submit this response to the Court’s procedural order requesting additional information concerning the “identities and places of citizenship of all The Deal’s members as of the date this action was filed” (*Procedural Order*, Doc. 9 at 3 (1/06/17)) and state as follows:

1. Annexed hereto as Exhibit A is a true and correct copy of the Affidavit of Eric Lundberg Proferring Jurisdictional Facts in Support of Defendants’ Notice of Removal, dated January 17, 2017 (the “Affidavit”). Mr. Lundberg, who serves as CFO of The Deal, affirms in his Affidavit that the sole member of The Deal is The Street, Inc., which is a corporation incorporated in Delaware with its principal place of business at 14 Wall Street, New York, NY.

2. The Deal shares the citizenship of its only member, The Street, Inc. and is thus a citizen of Delaware and of New York. *See Pramco, LLC v. San Juan Bay Marina, Inc.*, 435 F.3d 51, 54 (1st Cir. 2006). Complete diversity exists between the parties in this action since plaintiffs Hurry and Scottsdale Capital Advisors Corp are citizens of Nevada and Arizona,

respectively, and defendants Meagher and The Deal are variously citizens of California, Delaware and New York.

Respectfully submitted,  
The Deal, LLC and William Meagher  
By Their Attorneys:  
SHAHEEN & GORDON, P.A.

DATED: January 17, 2017

/s/ Steven M. Gordon  
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**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing Defendants' Response to Procedural Order was served on the following persons on this date and in the manner specified herein:

Electronically Served Through ECF:

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Dated: January 17, 2017

/s/ Steven M. Gordon  
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